

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION

MAY 23 2017

David J. Bradley, Clerk

UNITED STATES OF AMERICA

v.

NICHOLAS JOHN ZOTOS

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§  
§  
§  
§

Criminal No.

M-17-762

INDICTMENT

THE GRAND JURY CHARGES:

Count One

On or about April 30, 2017, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**NICHOLAS JOHN ZOTOS**

did knowingly and intentionally conspire and agree with other persons known and unknown to the Grand Jurors, to import into the United States of America from the United Mexican States a controlled substance. The controlled substance involved was 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 963, 952(a), 960(a)(1), and 960(b)(1).

Count Two

On or about April 30, 2017, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**NICHOLAS JOHN ZOTOS**

did knowingly and intentionally import into the United States of America from the United Mexican States a controlled substance. The controlled substance involved was 5 kilograms or more, that is, approximately 25 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 952(a), 960(a)(1), and 960(b)(1) and Title 18, United States Code, Section 2.

**Count Three**

On or about April 30, 2017, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**NICHOLAS JOHN ZOTOS**

did knowingly and intentionally conspire and agree with other persons known and unknown to the Grand Jurors, to possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

**Count Four**

On or about April 30, 2017, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**NICHOLAS JOHN ZOTOS**

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more, that is, approximately 25 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

A TRUE BILL

  
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FOREPERSON

ABE MARTINEZ  
ACTING UNITED STATES ATTORNEY

  
\_\_\_\_\_  
ASSISTANT UNITED STATES ATTORNEY